United States Environmental Protection Agency, Region III
Corrective Action Program

FINAL
Environmental Indicator Inspection Report
For
Lansdale Finishers, Inc.
21 Williams Place
Lansdale, PA 19446

EPA ID # PAD 002 371 581

Prepared By

TETRA TECH FW, INC.
One Oxford Valley, Suite 200
Langhorne, PA 19047-1829

March 2004

Table of Contents

RCRA SITE INSPECTION REPORT
LANSDALE FINISIHERS, INC.
RCRIS ID/EPA ID # PAD 002 343 200

LANSDALE FINISHERS, INC.
21 WILLIAMS PLACE
LANSDALE, PA 19446

Purpose: To gather relevant information from the Lansdale Finishers, Inc. (Lansdale Finishers), in order to determine whether human exposures and groundwater releases are controlled, as per Environmental Indicator Determination forms.

Documentation Review: Prior to the meeting, Ms. Maura Lavin of Tetra Tech FW, Inc. (TtFW) conducted an extensive record search at the Pennsylvania Department of Environmental Protection (PADEP) Conshohocken Regional Office. Subsequent to the meeting, a record search was conducted at the U. S. Environmental Protection Agency (USEPA) Region III Philadelphia Office. In addition, RT Environmental Services, Inc. (RT Environmental) submitted additional files to be used by TtFW in the preparation of this report. Files submitted by RT Environmental included a cover letter addressing issues and concerns noted during the EI Site Visit.

Attendees:

Name	Organization	Phone Number	E-Mail address
Maura Lavin	TtFW	(215) 702-4060	mlavin@ttfwi.com
Roxanne Clarke	TtFW	(215) 702-4003	roclarke@ttfwi.com
Jennifer Wilson	PADEP	(484) 250-5744	jewilson@state.pa.us
Cary S. Tye, Esq.	Colliers L&A	(215) 928-7533	cary.tye@colliers.com
Gary R. Brown	RT Environmental Services, Inc.	(610) 265-1510	gbrown@rtenv.com
Charles Mallory	Lansdale Finishers, Inc.	(215) 412-2430	

Meeting Summary: A meeting at Lansdale Finishers' facility was held with the attendees noted above on February 12, 2004. Ms. Roxanne Clarke, the TtFW Project Manager, presented the facility with information regarding USEPA Region III's Corrective Action process, the Environmental Indicator Assessment Program and the legislation driving this program. Under this investigation, USEPA Region III is focusing on two interim Environmental Indicators to evaluate whether any unacceptable risk to human health and the environment is ongoing at each priority facility. The two indicators are determining if human exposures are controlled and groundwater releases are controlled. Issues discussed at the meeting were as per a January 21, 2004 letter sent from PADEP Central Office.

Outstanding issues encountered during the file review process were discussed as per a summary of files submitted to all attendees prior to the meeting. The site visit continued with a tour of the Lansdale Finishers' facility. Photographs were taken and can be found in Appendix A.

A. Location and Operational History of the Facility, Including all Wastes Generated at the Facility and their Management.

Lansdale Finishers is located on approximately 2 acres on the eastern side of Broad Street in Lansdale, Montgomery County, Pennsylvania. The site, collectively known as Premises "A," consists of two tracts of land known as Tract 1 and Tract 2. There is another property also owned by Lansdale Finishers known as Premises "B." This approximately 1.2-acre property fronts Broad Street and was formerly used as a car dealership and service station. This report is only in reference to the property known as Premises "A" that was used by Lansdale Finishers for manufacturing operations which is identified as PAD002343200 in USEPA's files.

The facility is located within the borough of Lansdale, which consists of residential, commercial, and industrial areas. To the east and north of the site is the Reading Railroad line, which is currently used by Southeastern Pennsylvania Transportation Authority (SEPTA). Further to the north are commercial buildings. To the south and west are commercial buildings and residential housing. The site location map is included as Figure 1 in Appendix B. Figure 2 shows the property lines detailing Premises "A" and Premises "B" as well as the two tracts comprising Premises "A." A more detailed site layout map is included as Figure 3.

The northern half of the property is a large gravel parking area. A building containing an office, a production area, a paint vault, and a warehouse is located on the southern half of the property. A wooded area is located on the eastern side of the building and continues around to the southern side of the building. The site is bordered to the east by Septa railroad tracks. There is a small intermittent creek that parallels the railroad tracks and is located within fifty feet of the building. To the west of the site is Williams Place. (August 8, 1989)

The facility received premanufactured metal components such as windows and door frames, cleaned and treated them, applied a finish, and baked the components to harden the finish. Final products were wrapped and stored in the warehouse until shipment. The facility has been vacant since June 2003. The facility as well as the company is for sale and discussions are ongoing. As potential buyers may be interested in purchasing the business with inventory, the facility has not been decommissioned or dismantled. It remains largely the same as during its operational days. (August 8, 1989)

According to the Part A Hazardous Waste Permit Application, the facility has been in operation since January 1, 1952. However, later documents list start of site operations and units as 1968. According to information provided by RT Environmental, on behalf of Lansdale Finishers, the deed for the property was traced back to August 1952. On August 5, 1952 ownership of Tract 1 was transferred from J. Walter Rex and Jean Meters Rex to J.W. Rex Company (successor to Chem-Fin Coporation). The deed for Tract 1 was again transferred on March 25, 1968 to Lansdale Finishers. The ownership of Tract 2 was transferred from Reading Company, a Pennsylvania Corporation, on March 4, 1965 to Lansdale Finishers. Site use prior to Lansdale Finishers is unknown.

Lansdale Finishers submitted their first Notification of Hazardous Waste Activity on August 8, 1980. This notification listed the facility as a generation and treat/store/dispose facility.

Hazardous waste codes included F003, F005, F017, U159, U220, D001 (ignitable), D002 (corrosive), and D000 (toxic).

On November 18, 1980 Lansdale Finishers submitted a Part A Hazardous Waste Permit Application. This submission listed 300 gallons in storage containers (barrel, drum, etc.). The submission also listed the following hazardous waste managed at the facility:

USEPA Hazardous Waste No.	Estimated Annual Quantity of Waste	Management
U159	22,000 pounds	Storage in containers
U220	7,000 pounds	Storage in containers
K004	2,500 pounds	Storage in containers

PADEP granted interim status for the storage of 300 gallons of U159, U220, and K004 wastes in a July 23, 1981 letter. A formal request was made on March 2, 1983 for a Part B Hazardous Waste Permit Application. There is no indication that Lansdale Finishers submitted this application. Instead a revised Notification of Hazardous Waste Activity was submitted on February 14, 1984 for "deletion of an activity." This notification listed the facility only as a generator of hazardous waste.

At the time of an August 2, 1984 PADEP inspection, Lansdale Finishers was generating less than 1,000 kg/mo. of F005 hazardous waste and was considered a small quantity generator of waste paint thinner. Waste handling activities consisted of on-site storage and off-site reclamation. Waste was pumped from drums to tanker trucks for off-site reclaiming. PADEP noted that the last shipment had been prior to 1980 and approximately 50 drums had accumulated on-site. A schedule for removal of the drums was requested. No further information was contained in PADEP files.

According to a June 8, 1989 USEPA Potential Hazardous Waste Site form, Lansdale Finishers was noted as a medium priority site. Waste paint fragments and powders had been observed on site soils. This condition was noted as:

1. A direct exposure contact to 17,327 people as access to the site was unrestricted;
2. Unstable containment; and
3. Contamination of less than one acre of soil.

This form also noted "Contamination of Sewers" and "Illegal Unauthorized Dumping" as wastewater from the Treatment Area was discharged to the sewers until September 1988.

At the time of the 1989 Preliminary Assessment, hazardous wastes managed at the site included paint thinners, sludge, waste paints (liquid and solid forms), and wastewaters. Hazardous wastes generated at the site were classified as the following:

1. U139 (methyl ethyl ketone);
2. U220 (toluene);
3. K004 (wastewater treatment sludge);

4. F003 (spent nonhalogenated solvents); and
5. F005 (spent nonhalogenated solvents).

Non-hazardous wastes included paper, office wastes, and empty damaged drums.

PADEP conducted an inspection of the site on April 14, 2003. The facility was listed as generating 75 lbs./month of hazardous waste. Manifests from 2001 and 2002 indicated 110 gallons of waste paint thinner was shipped off-site each year. These wastes were listed as F005 and D035 waste flammable liquid. The wastes were stored in drums and transported off-site by Frank's Vacuum Service. Wastes were disposed of at Hukill Chemical Corporation. During this inspection it was noted that Lansdale Finishers were going out of business.

At the time of the April 2003 inspection, PADEP noted that Lansdale Finishers needed to properly manage a large quantity of unused paints, thinners, and process bath. The facility representatives noted that these materials were not yet declared wastes as the possibility exists for a prospective buyer to use these materials. However, the facility noted that they would properly dispose of all chemicals that could not be used. The facility was in the process of contacting permitted treatment facilities.

A rough inventory of materials stored at the facility was listed in the April inspection report. There were approximately one hundred 55-gallon drums and approximately four hundred 5-gallon pails. One drum of toluene was noted as well as one drum of methyl ethyl ketone. Another 55-gallon drum was clearly labeled as hazardous waste. This drum was used to store waste paint thinner. It was also noted that approximately 3,000 gallons of process cleaner solution was located in process tanks. Litter was noted in the intermittent creek alongside the facility during the April 2003 inspection.

The most recent Hazardous Waste Inspection report in PADEP files was from a November 19, 2003 inspection. At the time of this inspection the business was closed. The inspection was a follow-up to the April 2003 inspection, which noted a large volume of paint products. No one was present at the site and the building was locked. The PADEP inspector contacted the facility representatives who indicated that none of the materials noted in the April 2003 inspection had been removed. A decision would be made at the time of sale, which was anticipated as February 2004, as to what materials will be retained as product and what will be disposed of as waste. PADEP informed the facility that they should contact PADEP as to the status of these materials once a final determination as to their classification is made.

In 2003 RT Environmental submitted a Phase I Environmental Site Assessment (Phase I) for both Parcel "A" and Parcel "B." The site visit for the Phase I was conducted in April 2003. A search of regulatory databases associated with the Phase I revealed that the Lansdale Finishers site is located within the North Penn – Area 6 Site, which is classified as a National Priorities List (NPL) site. Groundwater beneath the site is impacted by the North Penn – Area 6 Site. The Phase I noted that the Lansdale Finishers site was investigated and determined not to be a likely source for the groundwater contamination.

B. Description of all Solid Waste Management Units (SWMUs) and/or Areas of Concern (AOCs)

Former 550-Gallon Leaded Gasoline Underground Storage Tank

As part of the Phase I historical Sanborn maps were reviewed and several underground storage tanks (USTs) were identified as potentially being located at the site. RT Environmental initiated a Phase II Environmental Site Assessment (Phase II) to investigate the presence of USTs as well as their site impacts. Following this review ground-penetrating radar (GPR) was used to scan suspected areas for USTs. One UST was confirmed along the northern side of the building. It was noted in the Phase I that this leaded gasoline tank was used during the gas crisis of the 1970s for filling up automobiles. GPR did not confirm the presence of other suspected USTs associated with prior use of the site.

In April 2003 RT Environmental installed two soil borings in the vicinity of the UST. Both borings were advanced to refusal, which was in the range of 11-12 feet below ground surface (bgs). No staining or odors were observed. Screening with a Photoionization Detector (PID) did not reveal contamination. Therefore, no soil samples were collected for laboratory analysis. However, this UST was recommended for removal. The Phase II noted that upon removal a Remedial Action Completion Report would be submitted and a "No Further Action" status was expected.

On May 13, 2003 a notification of contamination / release was made to PADEP's Storage Tank Program via telephone. It was noted that a release from a UST had resulted in soil contamination. Interim remedial measures included removal of the UST and contaminated soil.

In June 2003, PADEP conducted a follow-up inspection to a prior notification made for Lansdale Finishers. Suspected contamination had been identified due to multiple holes in the bottom of the UST at the time of removal. PADEP noted contamination as "confirmed." Environmental impacts were noted for both soil and groundwater. At the time of the follow-up inspection, the tank contents and contaminated soil had been removed. The extent of contamination was noted by product-stained soil and/or product-saturated soil. Confirmatory soil samples were collected. Groundwater was encountered during the excavation and a grab groundwater sample was collected. The excavation was approved by the Borough of Lansdale Fire Marshall prior to backfill.

An Underground Storage Tank System Closure Report was submitted to PADEP on July 24, 2003 as well as a Closure Notification Form on July 25, 2003. This report noted that there was "obvious, localized contamination – sample results do not meet standards / levels." The UST was historically used to store gasoline during the 1970s and had been out-of-service since approximately 1978. The facility had no plans to replace this UST. During the removal, holes measuring ¼" to ½" in diameter were noted along the bottom of the tank.

Approximately 18 tons of contaminated soil was removed and transported to Clean Earth of MD, Inc. in Hagerstown, MD. Overburden soils were separated during the excavation and used as backfill. The piping system for the UST consisted of steel pipe approximately five feet long.

This piping was removed with the exception of an approximately two foot long section that ran under a stormwater line. The dispensing piping had been removed at an unknown time.

The Closure Report noted that contamination was not "localized" (i.e. limited to within 3 feet of the tank system in every direction with no obvious water contamination). Therefore, continuation of interim remedial actions was necessary.

The following table summarizes the results of soil and groundwater samples collected as part of the tank closure. See Figure 2 for sample locations.

Constituent	T4-1 Soil	T4-2 Soil	T4-3 Soil	T4-4 Groundwater *
Benzene	< 0.05 mg/kg	< 0.05 mg/kg	< 0.05 mg/kg	47 µg/kg
Ethylbenzene	< 0.1 mg/kg	< 0.1 mg/kg	0.14 mg/kg	130 µg/kg
Cumene	< 0.1 mg/kg	< 0.1 mg/kg	< 0.1 mg/kg	11 µg/kg
Methyl tert butyl ether	< 0.1 mg/kg	< 0.1 mg/kg	< 0.1 mg/kg	< 0.2 µg/kg
Naphthalene	< 0.2 mg/kg	0.34 mg/kg	0.36 mg/kg	63 µg/kg
Toluene	< 0.1 mg/kg	< 0.1 mg/kg	0.12 mg/kg	92 µg/kg
Total Xylenes	< 0.3 mg/kg	< 0.3 mg/kg	< 0.3 mg/kg	530 µg/kg

* Sample exceeded Act 2 standards (used-aquifer, residential) for benzene (5 µg/L).

Appended to the Phase II is the Remedial Action Completion Report prepared by RT Environmental and dated July 25, 2003. As benzene exceeded applicable standards in the grab groundwater sample collected from the tank excavation, a groundwater investigation was deemed necessary. Two shallow monitoring wells were installed in June 2003 to assess groundwater impacts. The wells were sampled twice with the following results.

Constituent	Act 2 Standard	MW-1		MW-2	
		06/20/03	07/08/03	06/20/03	07/08/03
Benzene (µg/L)	5	<1.0	<1.0	<1.0	<1.0
Toluene (µg/L)	1,000	<2.0	<2.0	<2.0	<2.0
Ethylbenzene (µg/L)	700	<2.0	<2.0	<2.0	<2.0
Xylene (µg/L)	10,000	<6.0	<6.0	<6.0	<6.0
1,2-Dichloroethane (µg/L)	5	<2.0	<2.0	<2.0	<2.0
1,2-Dibromomethane (µg/L)	0.05	<0.05	<0.05	<0.05	<0.05
Cumene (µg/L)	1,100	<2.0	<2.0	<2.0	<2.0
Naphthalene (µg/L)	100	<4.0	<4.0	<4.0	<4.0
Lead (µg/L)	5	<5.0	<5.0	<5.0	<5.0

Act 2 Standard = Medium Specific Concentration for residential groundwater in used aquifer.

Based on the results of the two rounds of groundwater sampling, RT Environmental concluded that groundwater contamination was localized to the UST excavation during the removal of the UST. Soils were excavated vertically to the depth groundwater was encountered and horizontally until PID measurements indicated no measurements indicated no measurable level of volatile organic compounds. No further remediation was recommended.

In August 2003, Lansdale Finishers submitted a Registration / Permitting of Storage Tanks. The registration was submitted for the removal of the UST. This registration noted that this UST had never been registered.

In an August 19, 2003 letter, PADEP acknowledged receipt of the Closure Report for the permanent closure of the UST system and components. Appended to the Phase II is an October 2, 2003 letter from PADEP regarding the Remedial Action Completion Report. Documents pertaining to the UST closure and release of regulated substances were reviewed by PADEP. It was determined that Lansdale Finishers had attained their selected cleanup standards for each of the identified regulated substances. As a result the facility was granted a relief of liability.

Picture 1 shows the Former Underground Storage Tank (UST).

Dumpster

The 1989 Preliminary Assessment noted the Dumpster as a SWMU that had been in use at the site since 1968. As the facility is currently vacant, this unit is no longer operational. This dumpster was located on a grassy area in the back of the building in the southwestern corner of the property. It was noted that the Dumpster was welded on all sides but had no lid. Paint scrapings were noted on the ground around the Dumpster during the 1989 Preliminary Assessment.

The Dumpster was filled with trash, paint cans, and floor sweepings consisting of paint booth scrapings and other solid paint residue at the time of the 1989 Preliminary Assessment. A HNu reading of approximately 50 parts per million (ppm) above background levels was noted when the probe was placed in the Dumpster.

No documentation was found indicating that a release, sampling, or remediation has occurred relating to the Dumpster.

Paint Storage Vault

The 1989 Preliminary Assessment noted the Paint Storage Vault as a SWMU that had been in use at the site since approximately 1968. This unit was in operation until the facility closed in June 2003. The Paint Storage Vault was an approximately 28' x 60' area in the rear of the building. This area is constructed of concrete block and has a concrete floor. The floor is slightly recessed below the level of the warehouse floor and sloped to the center of the vault to contain spills.

This vault housed paints in 1-gallon, 5-gallon, and 55-gallon containers that were staged on wooden pallets. Wastes managed in the Paint Storage Vault include paint thinner (consisting of methyl ethyl ketone and toluene). Both new and waste paint thinners were stored in stainless steel drums in this area. (August 8, 1989)

At the time of the 1989 Preliminary Assessment, the floor was covered with paint drippings and some liquids were present on the lids of waste drums. A HNu reading of approximately 45 ppm above background levels was noted in the Paint Storage Vault.

Pictures 2 through 7 show the Paint Storage Vault during the EI Site Visit. No documentation was found indicating that a release, sampling, or remediation has occurred relating to the Paint Storage Vault. However, this area remains the same as it was during operational times. The vault is filled with drums of paint and waste materials. There were stains noted on the floor, a leak in the roof/wall, and several drums that were in poor condition. One drum was noted to be open as the top of the drum had corroded and caved in. Another drum was noted to be bulging at the top. These conditions were brought to the attention of the facility representatives. It was noted that they would be addressed in the near future.

Files submitted by RT Environmental included a February 20, 2004 cover letter addressing issues and concerns noted during the EI Site Visit. With respect to this area, it was noted that a hazardous materials specialist inspected all containers. One container was in need of recontainerization. It was noted that this would be completed by February 24, 2004. The wall staining in this area was further inspected and concluded to be due to past roof leakage. As the roof has been fixed this was not considered a current issue.

Treatment Area and Sump Canal

The 1989 Preliminary Assessment noted the Treatment Area and Sump Canal as a SWMU that had been in use at the site since approximately 1968. This unit was in operation until the facility closed in June 2003. The Treatment Area is located in the eastern portion of the building. This area is constructed of concrete and is recessed approximately three feet below the rest of the building. The Sump Canal runs through the center of the Treatment Area and is approximately 50' long by 4" deep.

Product treatment consisted of six different sprays. The sprays were contained in metal housings as products were conveyed through this area. The six treatments consisted of a sodium hydroxide spray, a deoxidizer spray, a chromium spray, and three rinses. The treatment spray runoff was collected in tanks and reused. Each of the six tanks is approximately three foot high with an open-top. (August 8, 1989)

Wastes managed in the Treatment Area included wastewaters from treatment tank overflows, rinse tank overflows, and drippings from the treated products or spray housings. These wastes were pumped to the Wastewater Holding Tank. Prior to September 1988, wastewater was not collected but discharged directly to the public sewer. According to facility representatives there was no Notice of Violation issued with regard to this release. The local sewer authority notified Lansdale Finishers that if the discharge were to continue that pretreatment would be required. The decision was made to collect the wastewater as the volume did not justify the cost to install pretreatment. (August 8, 1989)

Included in the Phase II performed by RT Environmental was an assessment of site impacts associated with the Sump Canal. Four soil borings were installed in the vicinity of the Sump Canal. Borings A-3 and A-7 were advanced to a depth of 4 feet within the Treatment Area of the building. Boring B-7 was advanced to refusal, 8 feet bgs, along the exterior of the building. Three soil samples were collected for laboratory analysis. The following table summarizes the results.

Constituent	Act 2 Standard	A-1 (4')	A-2 (3')	A-3 (4')
Total Metals				
Arsenic (mg/kg)	12	<8.0	11	10
Barium (mg/kg)	8,200	290	270	230
Trivalent Chromium (mg/kg)	190,000	138.4	22.3	790.5
Hexavalent Chromium (mg/kg)	94	31.6	68.7	49.5
Lead (mg/kg)	450	8.9	<5.0	9.3
Volatile Organic Compounds				
Acetone (mg/kg)	370	<0.07	<0.1	0.084
Benzene (mg/kg)	0.5	<0.0007	<0.001	0.0011
Carbon Disulfide (mg/kg)	190	<0.0014	<0.002	0.015
Ethylbenzene (mg/kg)	70	<0.0014	<0.002	<0.0016
Methylene Chloride (mg/kg)	0.5	<0.021	<0.03	0.1
Tetrachloroethene (mg/kg)	0.5	<0.0007	<0.001	0.0021
Toluene (mg/kg)	100	<0.0014	<0.002	<0.0016
Trichloroethene (mg/kg)	0.5	0.0011	<0.001	0.0024
Xylene (total) (mg/kg)	1,000	<0.0042	<0.006	<0.0049

Act 2 Standard = Medium Specific Concentration for residential soil in used aquifer.

The Phase II recommended no further investigative activities in the Sump Canal area as detections were below applicable standards. It was recommended that the Sump Canal be closed if future tenants were not expected to make use of this sump.

Pictures 8 through 12 shows the Treatment Area and Sump Canal. No documentation was found indicating that a release or remediation has occurred relating to the Treatment Area/Sump. This area remains the same as it was during operational times. The sump has not been cleaned out since closure of the facility. There was standing water and possibly sludge noted in the sump at the time of the EI Site Visit.

Wastewater Holding Tank

The 1989 Preliminary Assessment noted the Wastewater Holding Tank as a SWMU that had been in operation at the site since September 1988. This unit was in operation until the facility closed in June 2003. The Wastewater Holding Tank is a 1,200-gallon. This tank has no secondary containment.

Wastewater collected by the Sump Canal in the Treatment Area is pumped to the Wastewater Holding Tank. The wastewater, which may contain chromium, is stored in this tank and treated prior to release. The facility representatives noted that treatment was to facilitate solids to settle out of the wastewater stream. Prior to discharge, the borough and a private laboratory test the wastewater. (August 8, 1989)

During the EI Site Visit, TtFW attempted to take a picture of the Wastewater Holding Tank. However, due to poor lighting there is no useable picture of this tank. No documentation was found indicating that a release, sampling, or remediation has occurred relating to the Wastewater Holding Tank. It was noted during the EI Site Visit, that there is no longer a discharge from the facility. The Wastewater Holding Tank appeared to be empty.

Empty Drum Storage Area

The 1989 Preliminary Assessment noted the Empty Drum Storage Area as a SWMU that has been in operation at the site for an unknown period of time. The Empty Drum Storage Area was located outside the building in the rear lot. This area is approximately 25 feet from the intermittent stream. At the time of the 1989 Preliminary Assessment, approximately thirty used 55-gallon empty drums were noted in this area. Some of the drums had covers but it was noted that most were not covered. Some drums also contained dried paint pieces. Areas of paint stained soil were noted in the 1989 Preliminary Assessment. During the EI Site Visit, no empty drums were located in this area.

During the EI Site Visit, no outdoor drum storage area was noted. However, stray drums and debris were noted to be in the intermittent creek and potentially impeding the flow. Facility representatives noted that access to the site is not restricted and this area is frequented by trespassers. The facility representatives noted that they would contact the Borough of Lansdale regarding the removal of debris from the intermittent creek.

Files submitted by RT Environmental included a February 20, 2004 cover letter addressing issues and concerns noted during the EI Site Visit. With respect to this area, it was noted that RT Environmental had planned to collect a soil sample near the empty drum. However, further inspection revealed that the drum was apparently used as a municipal trash container in an upstream park. The drum was removed and RT Environmental declined to sample the underlying soil as the drum was not associated with activities at the Lansdale Finishers site and not thought to be a concern.

At the time of the EI Site Visit, the Empty Drum Storage Area was located inside the building along the back wall. Picture 13 shows the Empty Drum Storage Area (indoor). Pictures 14 through 16 show the intermittent creek near the former outdoor storage area. Pictures 17 through 20 show the drums and debris in and around the intermittent creek. No documentation was found indicating that a release, sampling, or remediation has occurred relating to the Empty Drum Storage Area.

Paint Booth

The 1989 Preliminary Assessment noted the Paint Booth as a SWMU that had been in operation since 1968. This unit was in operation until the facility closed in June 2003. The Paint Booth is located next to the Treatment Area in the center of the building and was used to paint products. The area is enclosed with the exception of where the product conveyor entered and exited the area.

Wastes managed in this area consisted of paint scrapings from overspray on the floor and walls. These paint scrapings were swept up and disposed of in the Dumpster with normal floor refuse. (August 8, 1989)

Picture 21 shows the Paint Booth. No documentation was found indicating that a sampling or remediation has occurred relating to the Paint Booth.

Waste Paint Storage Area

The 1989 Preliminary Assessment noted the Waste Paint Storage Area as a SWMU at the site that had been in operation for at least the previous seven months. The Waste Paint Storage Area was located along the inside back wall of the building in the southeastern corner.

Waste paint drums which contained spoiled paint were stored on wooden pallets in this area prior to removal from the site. It was noted that these waste paints could contain paint thinner constituents including methyl ethyl ketone or toluene. (August 8, 1989)

No documentation was found indicating that a release, sampling, or remediation has occurred relating to the Waste Paint Storage Area.

C. Description of Exposure Pathways for all Releases or Potential Releases

Air: Lansdale Finishers is located in the center of the borough of Lansdale. According to the 1989 Preliminary Assessment, the population within a one-mile radius of the site is 17,327 people. Between one and two miles of the site, 8,185 people reside. A total of 35,956 people reside within three miles of the site.

Groundwater: During the removal of the 550-gallon UST in 2003, groundwater was encountered at approximately 5 ½ feet bgs.

Surface Water: Surface water from the site appeared to flow to the south and southwest into a small, intermittent creek located near the site. This creek appears to drain to one of two small tributaries of Towamencin Creek, approximately 0.5 miles to the west of the site. Towamencin Creek is used for recreational purposes and flows into Skippack Creek. Skippack Creek is classified as a trout-stocked fishery and is used for recreational purposes. No surface water intakes or wetlands have been identified within five miles of the site.

Soil: The Lansdale Finishers' site is situated in the Triassic Lowland Section of the Piedmont Physiographic Province. The rocks that underlie the site consist of mainly conglomerate, arkose, sandstone, siltstone, argillite, and shale. Underlying the site is the Triassic age Brunswick Formation. This formation consists of reddish-brown shale, mudstone, and siltstone.

The site is underlain by soil mapped as Made land formed by altering and mixing of soil formed in material weathered from shale and sandstone. Much of the land type is made up of dusky red to yellowish-brown shaly silt loam to channery sandy loam. Depth to bedrock ranges between zero to six feet.

D. Exposure Pathway Controls and/or Release Controls Instituted at the Facility

Air: The facility is currently inactive and there are no air emission sources. There are no known air permits for the operational history of the site.

Groundwater: The immediate study area is served by the North Penn Water Authority (NPWA). The NPWA service approximately 55,000 customers in Hatfield and Towamencin

Townships and Lansdale. A total of 50 water supply wells (including 2 within 1,500 feet east of the site) are used by the NPWA.

The Hatfield Borough Water Department (HBWD) serves the borough of Hatfield. The HBWD serves approximately 7,500 people. A total of 6 water supply wells (all located 2.5 miles to the north of the site) are used by the HBWD.

The southern and eastern portions of the study area are served by the North Wales Water Authority (NWWA). The NWWA services approximately 35,200 people in the municipalities of Upper Gwynedd, Lower Gwyneed, and Montgomery and North Wales Townships. A total of 27 water supply wells (all located 4.5 miles to the northeast of the site) are used by the NWWA. At the time of the 1989 Preliminary Assessment, it was estimated that as many as five private home and private industrial wells may be located within one mile of the site.

Surface Water: There is an intermittent creek that runs through the property. There are three storm drain grates to the northeast of the building which drain to this creek. There is also a "storm sewer opening" to this creek (discharge for stormwater). There are no known surface water discharge permits for the operational history of the site. Pictures 22 and 23 shows the discharge pipe to the intermittent creek.

Soil: Access to the site is not controlled. The facility representatives noted that there have been no issues at the site regarding break-ins. However, graffiti was noted on the exterior of the building as well as empty bottles on the ground indicating that trespassing is an issue at this site.

E. Follow-up Action Items

USEPA, Region III will decide if additional information or sampling at the facility is required to determine whether or not the environmental indicators have been met or if corrective action is required by the facility.

SUMMARY OF RELEASES

Date of Release	Nature of Release	Document
May 13, 2003	During the removal of an out-of-service UST at the property, soil contamination was discovered. The UST, which was historically used to store leaded gasoline, was found to contain numerous holes in the bottom of the tank.	Multiple Documents

APPENDIX A
INSPECTION PHOTOGRAPHS
LANSDALE FINISHERS, INC.
LANSDALE, PA 19446

APPENDIX B
SITE LOCATION MAP
LANSDALE FINISHERS, INC.
LANSDALE, PA 19446

APPENDIX C
INVENTORY OF DOCUMENTATION
LANSDALE FINISHERS, INC.
LANSDALE, PA 19446

1. **January 21, 2004** Letter from PADEP to Lansdale Finishers, Inc. regarding RCRA Corrective Action at the facility – PADEP (Harrisburg) files
2. **August 21, 1989** Environmental Priorities Initiative Preliminary Assessment of Lansdale Finisher, Inc. – PADEP files
3. **Undated** Deed Information – RT Environmental/Lansdale Finisher files
4. **August 8, 1980** Notification of Hazardous Waste Activity – PADEP files
5. **November 18, 1980** Part A Hazardous Waste Permit Application – PADEP files
6. **July 23, 1981** Notification of Operation During Interim Status – PADEP files
7. **March 2, 1983** Letter from PADEP to Lansdale Finishers, Inc. regarding Part B Application – PADEP files
8. **February 14, 1984** Notification of Hazardous Waste Activity – PADEP files
9. **August 2, 1984** Hazardous Waste Inspection Report – PADEP files
10. **June 8, 1989** USEPA Potential Hazardous Waste Site – PADEP files
11. **April 14, 2003** Hazardous Waste Inspection Report – PADEP files
12. **November 19, 2003** Hazardous Waste Inspection Report – PADEP files
13. **September 29, 2003** Phase I Environmental Site Assessment – RT Environmental/Lansdale Finisher files
14. **July 25, 2003** Phase II Environmental Site Assessment – RT Environmental/Lansdale Finisher files
15. **May 13, 2003** Phone Notification of Contamination / Release for Storage Tank Program – PADEP files
16. **June 2003** Notification of Reportable Release / Notification of Contamination – PADEP files
17. **July 24, 2003** Underground Storage Tank System Closure Report – PADEP files
18. **July 25, 2003** Underground Storage Tank System Closure Notification Form – PADEP files
19. **August 2003** Registration / Permitting of Storage Tanks – PADEP files
20. **August 19, 2003** Letter from PADEP to Lansdale Finishers, Inc. regarding Storage Tank Program – PADEP files
21. **February 20, 2004** Letter from RT Environmental to TtFW regarding Lansdale Finishers Submittal of Environmental Reports – TtFW files

REFERENCE DOCUMENTS

1. January 21, 2004 Letter from PADEP to Lansdale Finishers, Inc. regarding RCRA Corrective Action at the facility

PROVIDED BY: PADEP

2. August 21, 1989 Environmental Priorities Initiative Preliminary Assessment of Lansdale Finisher, Inc.

PROVIDED BY: PADEP

3. Undated Deed Information –

PROVIDED BY: RT Environmental/Lansdale Finisher

4. August 8, 1980 Notification of Hazardous Waste Activity

PROVIDED BY: PADEP

5. November 18, 1980 Part A Hazardous Waste Permit Application

PROVIDED BY: PADEP

6. July 23, 1981 Notification of Operation During Interim Status

PROVIDED BY: PADEP

7. March 2, 1983 Letter from PADEP to Lansdale Finishers, Inc. regarding Part B Application

PROVIDED BY: PADEP

8. February 14, 1984 Notification of Hazardous Waste Activity

PROVIDED BY: PADEP

9. August 2, 1984 Hazardous Waste Inspection Report

PROVIDED BY: PADEP

10. June 8, 1989 USEPA Potential Hazardous Waste Site

PROVIDED BY: PADEP

11. April 14, 2003 Hazardous Waste Inspection Report

PROVIDED BY: PADEP

12. November 19, 2003 Hazardous Waste Inspection Report

PROVIDED BY: PADEP

13. September 29, 2003 Phase I Environmental Site Assessment

PROVIDED BY: RT Environmental/Lansdale Finisher

14. July 25, 2003 Phase II Environmental Site Assessment

PROVIDED BY: RT Environmental/Lansdale Finisher

15. May 13, 2003 Phone Notification of Contamination / Release for Storage Tank Program

PROVIDED BY: PADEP

16. June 2003 Notification of Reportable Release / Notification of Contamination

PROVIDED BY: PADEP

17. July 24, 2003 Underground Storage Tank System Closure Report

PROVIDED BY: PADEP

18. July 25, 2003 Underground Storage Tank System Closure Notification Form

PROVIDED BY: PADEP

19. August 2003 Registration / Permitting of Storage Tanks

PROVIDED BY: PADEP

20. August 19, 2003 Letter from PADEP to Lansdale Finishers, Inc. regarding Storage Tank Program

PROVIDED BY: PADEP

21. February 20, 2004 Letter from RT Environmental to TtFW regarding Lansdale Finishers Submittal of Environmental Reports

PROVIDED BY: TtFW files